

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

LORI WRIGHT and TEDDY E.	*
WRIGHT, as Next Friends and	*
Parents of Destin Wright, Deceased	*
	*
Plaintiffs,	*
	*
	CIVIL ACTION FILE
vs.	NO.: 4:15-CV-00059-HLM
	*
JOHNNY MOATS, Individually and in	*
his Official Capacity as Polk County	*
Sheriff; J. KELLY MCLENDON,	*
Individually and in His Official Capacity	*
as Polk County Sheriff; POLK COUNTY,*	*
GEORGIA; SOUTHERN HEALTH	*
PARTNERS, INC.; K. HEATH, LPN;	*
SHANNON TURNER, LPN;	*
J. THOMAS, LPN; and BETTY	*
FOWLER, LPN in their Individual	*
Capacities; JOHN DOES I, II, and	*
JANE DOES I, II, and III, in their	*
Individual Capacities	*
	*
Defendants.	*

**PLAINTIFF TEDDY E. WRIGHT'S AMENDED NOTICE OF
VIDEO DEPOSITION OF J. KELLY MCLENDON**

To: J. Kelly McLendon
c/o Gary Kevin Morris
Williams, Morris & Waymire, LLC
4330 South Lee Street, NE
Building 400, Suite A
Buford, GA 30518

You are hereby noticed that on **October 17, 2016**, beginning at **1:00 P.M.**, at Gammon, Anderson & McFall, 105 Prior Street, Cedartown, Georgia 30125,, counsel for Plaintiff will proceed to take the video deposition of **J. KELLY MCLENDON**, upon oral examination for the purposes of discovery and all other purposes allowed under the law, pursuant to Federal Rules of Civil Procedure Rules 26 and 30. The video deposition will be taken before an officer duly authorized to administer oaths and to take depositions. The video deposition will be recorded stenographically. The oral examination will continue from day to day until its completion.

This 14th day of October, 2016.

/s/ Robert K. Finnell
Georgia State Bar No. 261575
The Finnell Firm
P.O. Box 63
Rome, Georgia 30162-0063
Phone: 706-235-7272 / Fax: 706-235-9461
Email: bob@finnellfirm.com
Attorney for Teddy E. Wright

/s/ H.L. Cromartie, III
Georgia State Bar No. 197190
H.L. Cromartie III, P.C.
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Rome, Georgia 30162-1897
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Email: rick@hlcromartielaw.com
Attorney for Teddy E. Wright

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for Defendant with a true and exact copy of the **PLAINTIFF TEDDY E. WRIGHT'S AMENDED NOTICE TO TAKE VIDEO DEPOSITION OF J. KELLY MCLENDON**, by filing same with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to the following attorney of record:

Clarence Victor Long
Office of C. Victor Long
4995 Erin Road
Atlanta, GA 30331

Natalie Denese Gatson
Law Offices of Natalie Gatson
P.O. Box 310928
120 North McDonough Street
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Shira Adler Crittendon
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Jennifer Jenivene Neal-Jones
Neal Jones & Handrick Law, LLC
180 Camden Hill Road, Suite D
Lawrenceville, GA 30046

Gary Kevin Morris
Williams, Morris & Waymire, LLC
4330 South Lee Street, NE
Building 400, Suite A
Buford, GA 30518

This 14th day of October, 2016.

/s/ H.L. Cromartie, III

H.L. Cromartie, III
Georgia State Bar No: 197190
Attorney for Plaintiff

CERTIFICATE OF COMPLIANCE WITH LR 5.1(C)

This is to certify that the foregoing pleading was prepared using Times New Roman 14 point in accordance with LR 5.1(C).

H.L. CROMARTIE III, P.C.

/s/ H.L. Cromartie, III

H.L. Cromartie, III
Georgia State Bar No: 197190
Attorney for Plaintiff